

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

	X	
	:	
In re	:	Chapter 7
	:	
HERITAGE HOME GROUP, LLC, <i>et al.</i> , ¹	:	Case No. 18-11736 (BLS)
	:	
Debtors.	:	(Jointly Administered)
	:	
	X	
	:	
ALFRED T. GIULIANO, in his capacity as	:	
Chapter 7 Trustee of HERITAGE HOME	:	
GROUP, LLC <i>et al.</i> ,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Adv. Proc. No. 20-50771 (BLS)
	:	
WAYNE INDUSTRIES, INC.	:	
	:	
Defendant.	:	
	:	
	X	

STIPULATION FOR EXTENSION OF TIME TO RESPOND

IT IS HEREBY STIPULATED AND AGREED, by and between the above-captioned plaintiff (the “Plaintiff”) and the above-captioned defendant (“Defendant”), that the Defendant’s time within which to answer, move or otherwise respond to the *Complaint for Avoidance and Recovery of Preferential Transfers Pursuant to §§ 547 and 550* [D.I. 1] (the “Complaint”) is extended through and including November 6, 2020.

IT IS FURTHER STIPULATED AND AGREED that the Defendant hereby waives any defense it might have pursuant to Federal Rules of Civil Procedure 12(b)(4) and 12(b)(5), as

¹ The Debtors in these cases, along with the last four digits of each Debtor’s tax identification numbers, are: Heritage Home Group LLC (9506); HH Global II B.V. (0165); HH Group Holdings US, Inc. (7206); HHG Real Property LLC (3221); and HHG Global Designs LLC (1150). The Debtors’ corporate headquarters was located at 1925 Eastchester Drive, High Point, North Carolina 27265.

incorporated into this proceeding by Federal Rule of Bankruptcy Procedure 7012, without prejudice to its other defenses of any kind whatsoever.

Dated: September 29, 2020
Wilmington, Delaware

/s/ Marcos A. Ramos

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*Proposed Counsel to Plaintiff, Alfred T. Giuliano,
Chapter 7 Trustee for the Estates of Heritage Home
Group, LLC, et al.*